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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

XIAO YE BAI,

Petitioner,

vs.

STATE OF NEVADA, *et al.*,

Respondent(s).

Case No. 2:20-cv-02042-KJD-NJK

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO SECOND AMENDED  
PETITION FOR WRIT OF HABEAS  
CORPUS (ECF NO. 24)**

**(SECOND REQUEST)**

Respondents move this Court for an enlargement of time of 60 days from the current due date of October 7, 2022, up to and including December 6, 2022, in which to file their Answer to Second Amended Petition for Writ of Habeas Corpus (ECF No. 24). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: October 7, 2022.

Submitted by:

AARON D. FORD  
Attorney General

By: /s/ Jaimie Stilz  
Jaimie Stilz (Bar. No. 13772)  
Deputy Attorney General

**DECLARATION OF JAIMIE STILZ**

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Xiao Ye Bai v. State of Nevada, et al.*, Case No. 2:20-cv-02042-KJD-NJK, and as such, have personal knowledge of the matters contained herein.

2. This is my second request for an extension to file the Answer to the Second Amended Petition for Writ of Habeas Corpus (ECF No. 24), and this Motion is made in good faith and not for the purpose of delay.

3. The Answer is currently due on October 7, 2022.

4. I am unable with due diligence to timely complete the Answer herein. I am still attempting to manage ongoing medical/health issues. I am also managing a significant workload that has recently expanded due to a senior supervising colleague leaving the office, and the assignment of two upcoming oral arguments in the Ninth Circuit. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Answer in a timely fashion, thus necessitating an extension.

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my new supervising senior colleague.

6. I have spoken to counsel for Bai, and he does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 60 days, up to

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1 and including December 6, 2022, to file the Answer to the Second Amended Petition for Writ of Habeas  
2 Corpus (ECF No. 24).

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on this 7<sup>th</sup> day of October, 2022.

5 /s/ Jaimie Stilz

6 Jaimie Stilz (Bar No. 13772)  
7 Deputy Attorney General

8 **IT IS SO ORDERED:**

9 

10 UNITED STATES DISTRICT JUDGE

11 Dated: October 11, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 7th day of October, 2022, I served a copy of the foregoing *Unopposed Motion for Enlargement of Time to File Answer to Second Amended Petition for Writ of Habeas Corpus (ECF No. 24)*, by U.S. District Court CM/ECF electronic filing, to:

Ron Y. Sung  
Assistant Federal Public Defender  
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/s/ C. Martinez  
An employee of the Office of the Attorney General